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Model for Letters of Request recommended for use in applying the Hague Convention of 18 March 1970 on the Taking of Evidence Abroad in Civil or Commercial Matters

Request for International Judicial Assistance pursuant to the Hague Convention of 18 March 1970 on the Taking of Evidence Abroad in Civil or Commercial Matters

N.B. Under the first paragraph of Article 4, the Letter of Request shall be in the language of the authority requested to execute it or be accompanied by a translation into that language. However, the provisions of the second and third paregraphs may permit use of English, French or another language.

In order to avoid confusion, please spell out the name of the month in each date.

Please fill out an original and one copy of this form (use additional space if required).

1.	Sender	United States District Court for the District of Massachusetts One Courthouse Way Boston, MA 02110		
2.	Central Authority of the Requested State	The Israeli Central Authority Directorate of Courts 19 Jaffa Road Jerusalem		
3.	Person to whom the executed request is to be returned	Lawrence Green, Esq. Burns & Levinson, LLP 125 Summer Street Boston, MA 02110		
4.	Specification of the date by which the requesting authority requires receipt of the response to the Letter of Request			
	Date	October 1, 2008		
	Reason for urgency*			

^{*} Omit if not applicable.

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IN CONFORMITY WITH ARTICLE 3 OF THE CONVENTION, THE UNDERSIGNE	D
APPLICANT HAS THE HONOUR TO SUBMIT THE FOLLOWING REQUEST:	

5.	a	Requesting judicial authority (Article 3,a))	United States District Court for the District of Massachusetts One Courthouse Way Boston, MA 02110
	b	To the competent authority of (Article 3, a))	Israeli Central Authority Directorate of Courts 19 Jaffa Road Jerusalem
	С	Names of the case and any identifying number	Sheldon G. Adelson v. Moshe Hananel C.A. No.: 04-cv-10357-RCL
6	Names parties : tives (in tives in (Article		
	a	Plaintiff	Sheldon G. Adelson
		Representatives	Franklin H. Levy, Esq. Duane Morris, LLP 470 Atlantic Avenue, Sulte 500 Boston MA 02110
	b	Defendant	Moshe Hananei
		Representatives	Lawrence G. Green, Esq. Burns & Levinson, LLP 125 Summer Street Boston, MA 02110
	С	Other parties	·
		Representatives	

^{*} Omit if not applicable.

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7.	a	Nature of the proceedings (divorce, patemity, breach of contract, product liability, etc.) (Article 3, c))

Declaratory judgment regarding employment contract.

b Summary of complaint

Parties' employment agreement for investment options.

Summary of defence
 and counterclaim*

Other necessary information or documents*

a Evidence to be obtained

or other judicial act to be performed (Article 3, d))

d

Examination of witness

 Purpose of the evidence or judicial act sought

 Identity and address of any person to be examined (Article 3, e))*

Avi Hefetz 22 Kanfey Nesharium Street Jerusalem

 Questions to be put to the persons to be examined or statement of the subjectmatter about which they are to be examined (Article 3, f))*

Avi Hefetz will be examined regarding his work for Adelson on Investment projects during the relevant period, including the Africa Israel potential Investment and the Eilat casino project, all material to proof of Hananel's work with Adelson on casino development and other matters.

^{*} Omit if not applicable.

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11. Documents or other prope to be inspected (Article 3, g))*	erty		
 Any requirement that the evidence be given on oath or affirmation and any special form to be used (Article 3, h))* 	All depos oath.	ition tesitmony is to be gi	iven under
13. Special methods or proce to be followed (e.g. oral or in writing, verbatim, transcript or summary, cross-examination, etc.) (Articles 3, i) and 9)*		nt's counsel is to conduct ons.	the
14. Request for notification of the time and place for the execution of the Request and Identity and eddress of any person to be notified (Article 7)*	l		
15. Request for attendance or participation of judicial personnel of the requestin authority at the execution of the Letter of Request (Article 8)*	l		

^{*} Omit if not applicable.

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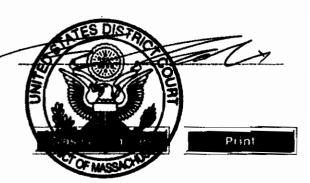
 Specification of privilege or duty to refuse to give evidence under the law of the State of origin (Article 11, b))*

17. The fees and costs incurred which are reimbursable under the second paragraph of Article 14 or under Article 26 of the Convention will be borne by*

July 25, 2008

DATE OF REQUEST

SIGNATURE AND SEAL OF THE REQUESTING AUTHORITY



^{*} Omit if not applicable.